UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 19 2014

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL 7009 1680 0000 7677 8282
RETURN RECEIPT REQUESTED

Mr. Joe Goodrich
Plant Operations Manager
Axson Technologies
1611 Hults Drive
Eaton Rapids, Michigan 48827

Re: Notice of Violation
RCRA Compliance Evaluation Inspection
Cass Polymers of Michigan, Inc.
EPA I.D. No.: MID985606508

Dear Mr. Goodrich:

On December 12, 2013, representatives of the U.S. Environmental Protection Agency and the Michigan Department of Environmental Quality (MDEQ) conducted an inspection at Cass Polymers of Michigan, Inc. (Cass Polymers), located at 815 West Shepherd Street, in Charlotte, Michigan. The purpose of the inspection was to evaluate Cass Polymers' compliance with certain requirements of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment, and storage of hazardous waste by a large quantity generator of such wastes. A copy of the EPA inspection report and checklists is enclosed for your reference.

Based on information provided by Cass Polymers' personnel, a review of records and personal observations by the inspector, EPA finds that Cass Polymers is engaged in the management of hazardous waste without a hazardous waste storage license, and is in violation of certain requirements of the United States Code of Federal Regulations (C.F.R.) and the Michigan Administrative Code (MAC). To be eligible for the exemption from the requirement to apply for and obtain a hazardous waste storage license, Cass Polymers must be in compliance with the conditions of MAC R. 299.9306 [40 C.F.R. § 262.34]. Specifically, we find that Cass Polymers is not in compliance with the following condition for a storage license exemption, and in violation of the following hazardous waste requirements:

1. A generator shall keep a copy of each manifest signed in accordance with MAC R. 299.9304(4) for three years or until he or she receives a signed copy from the designated facility which received the waste. This signed copy shall be retained as a record for not

less than three years from the date the waste was accepted by the initial transporter. See MAC R. 299.9307(3) [40 C.F.R. § 262.40(a)].

During the inspection of records, Mr. Goodrich stated that there were no manifests retained on-site. The manifests had been sent to Cass Polymers' Madison Heights, Michigan facility as stated by Mr. Goodrich. Mr. Goodrich stated that documentation of the retained manifests would be forthcoming after the inspection. Cass Polymers, therefore, violated the manifest retention requirement. However, Cass Polymers submitted correspondence dated February 2, 2014, which documented that the manifest copies signed by the designated facility had been retained by Cass Polymers. Thus, no further actions are necessary to comply with this requirement.

2. Generators must retain on-site a copy of all notices, certifications, waste analysis data, and other documentation produced pursuant to this section for at least three years from the date that the waste that is the subject of such documentation was last sent to on-site or off-site treatment, storage, or disposal. The three year record retention period is automatically extended during the course of any unresolved enforcement action regarding the regulated activity or as requested by the Administrator. The requirements of this paragraph apply to solid wastes even when the hazardous characteristic is removed prior to disposal, or when the waste is excluded from the definition of hazardous or solid waste under 40 CFR 261.2 through 261.6, or exempted from Subtitle C regulation, subsequent to the point of generation. See, MAC R. 299.9311(1), 40 C.F.R. § 268.7(a)(8).

   During the inspection of records, there was no LDR documentation available on-site for the hazardous waste streams that had been shipped off-site. Mr. Goodrich stated that documentation of all LDR notices for each waste stream would be forthcoming after the inspection. Cass Polymers, therefore, violated a land disposal recordkeeping requirement. However, Cass Polymers submitted correspondence dated March 4, 2014, which documented that the LDR documentation had been retained. Thus, no further actions are necessary to comply with this requirement.

3. In order to retain the exemption from the requirement to obtain a hazardous waste storage license, a large quantity generator must ensure that facility personnel with hazardous waste management responsibilities successfully complete an initial hazardous waste training program which teaches facility personnel hazardous waste management procedures which includes contingency plan implementation; and receive annual review training thereafter. See, MAC R. 299.9306(1)(d), 40 C.F.R. § 265.16(c) and (d)(4) [40 C.F.R. § 262.34(a)(4)]. This is also a requirement for owners and operators of hazardous waste storage facilities, under MAC R. 299.9601(3) and 40 C.F.R. § 264.16(c) and (d)(4).

   During the inspection of records, there was no RCRA training documented for 2013. The last documented RCRA training occurred on January 18, 2012. Cass Polymers, therefore, failed to comply with the above-referenced condition for a storage license exemption, and violated the storage facility training and training record requirements. However, Cass Polymers submitted correspondence dated February 2, 2014, which stated that Cass

Polymers had moved out of this facility. Thus, no further actions are necessary to comply with this condition/requirement.

4. A universal waste small quantity handler who accumulates universal waste lamps must manage the lamps in a manner that prevents breakage or the release of any universal waste or components of universal waste, by containing unbroken lamps in structurally sound packaging that is compatible with the contents of the lamps and will prevent breakage during normal handling conditions. The packaging shall remain closed and lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions. Also, a universal waste small quantity handler of spent lamps or packaging in which the lamps are contained shall label the lamps or packaging with the words "universal waste lamps," "waste lamps," or "used lamps." See, MAC R. 299.9228(4)(c)(ii) and (c)(iv), 40 C.F.R. §§ 273.13(d)(1), and 273.14(e).

   During the inspection of the Maintenance Area, there was one 30-gallon container that contained spent metal halide bulbs. The container was labeled as "Waste Metal Hail Bulbs", was dated 3/20/12, and was closed. Mr. Willbur stated that the date on the container label was not accurate since the spent bulbs in the container were accumulated for approximately three months. Also, there were four 8-foot spent fluorescent bulbs that were not contained or labeled. Cass Polymers, therefore, violated universal waste management requirements. However, Cass Polymers submitted correspondence dated February 2, 2014, which documented that Cass Polymers had implemented proper universal waste management. Thus, no further actions are necessary to comply with these requirements.

5. A large quantity generator who accumulates hazardous waste on-site for 90 days or less, and who does not meet the conditions for a license exemption of MAC R. 299.9306(1)-(2) [40 C.F.R. § 262.34(a) and (c)], is an operator of a hazardous waste storage facility, and is required to obtain a hazardous waste storage license. See, MAC R. 299.9502(1), 299.9508, and 299.9510 [40 C.F.R. §§ 270.1, 270.10, and 270.13].

   On failing to comply with the condition for a license exemption referenced in item 3 above, Cass Polymers became an operator of a hazardous waste storage facility, and was required to apply for and to obtain a hazardous waste storage license. Cass Polymers did not apply for, or obtain, a hazardous waste storage license. Cass Polymers' failure to apply for and to obtain a hazardous waste storage license violated the licensing requirements of MAC R. 299.9502(1), 299.9508, and 299.9510 [40 C.F.R. §§ 270.1, 270.10, and 270.13].

Under section 3008(a) of RCRA, 42 U.S.C. § 6928(a), EPA may issue an order assessing a civil penalty for any past or current violation and requiring compliance immediately or within a specified period. Since Cass Polymers established compliance either during the inspection or through submitted correspondence that included documentation of actions that have been taken since the inspection to establish compliance with the above-referenced condition and requirements, EPA does not plan additional enforcement action at this time. This letter does not

limit the applicability of the requirements evaluated, or of other federal or state statutes or regulations.

If you have any questions or concerns regarding this letter, please contact Bryan Gangwisch, of my staff, at 312-886-0989.

Sincerely,

Gary J. Victorine, Chief
RCRA Branch

Enclosures

cc: Bill Yocum, MDEQ-Lansing District Office
yocumw@michigan.gov

John Craig, MDEQ-Lansing Office
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5, LCD, RCRA BRANCH, LR-8J
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME: Cass Polymers of Michigan, Inc.

EPA ID No.: MID985606508

ADDRESS: 815 W. Shepherd Street
Charlotte, MI 48813

DATE OF INSPECTION: December 12, 2013

EPA INSPECTOR: Bryan Gangwisch

PREPARED BY: Bryan Gangwisch, Environmental Scientist, Compliance Section #2 — 1/3/14 (Date Completed)

ACCEPTED BY: Julie Morris, Chief, Compliance Section #2 — 1/8/14 (Date)

Purpose of Inspection
This inspection was an evaluation of Cass Polymers of Michigan, Inc. (Cass Polymers), and its compliance with hazardous waste regulations found at Michigan Administrative Code (MAC) and the Code of Federal Regulations (CFR). I performed the inspection with William Yocum of the Michigan Department of Environmental Quality (MDEQ). The inspection was a Federal lead RCRA Compliance Evaluation Inspection (CEI).

Participants

Joe Goodrich, Facility Manager	Cass Polymers
Doug Willbur, Maintenance	Cass Polymers
Bryan Gangwisch, Environmental Scientist	U.S. EPA
William L. Yocum, Environmental Quality Analyst	MDEQ

Introduction
The inspectors arrived at the site on December 12, 2013, at approximately 9:00 a.m. The weather consisted of cloudy conditions with light wind, and an ambient air temperature of approximately 11 degrees Fahrenheit. As Mr. Goodrich arrived, we introduced ourselves, presented our inspector credentials and identification, and described the purpose of the inspection and the process by which we intended to conduct the inspection. We were led to a conference room. Mr. Goodrich provided us with a verbal description of the site, led the tour throughout the facility, and then attempted to provide us with the records we requested for review.

Site Description
During the opening conference Mr. Goodrich stated all of the following unless otherwise noted: The facility operated as a manufacturer of multiple epoxy resin, polyester, and urethane plastic systems for aerospace, automotive and marine applications. This included epoxy laminating systems, polyester adhesives and tooling/repair materials.

The facility was purchased by Axson Technologies (Eaton Rapids, Michigan) on August 1, 2013. Operations ceased at this facility around the middle of November 2013. The facility planned to be completely moved into the Axson Technologies facility by January 31, 2014. The existing building was not purchased by Axson Technologies. Cass Polymers still owns the building.

There were approximately 20 employees that worked at this facility prior to its ceased operations. At the time of the inspection the facility employed four employees.

At the time of the inspection, Cass Polymers was operating as a large quantity generator (LQG) of hazardous waste. Cass Polymers had become a large quantity generator for 2013 in January 2013. The facility generated and then shipped off-site 550 gallons of hazardous waste (D001 and

D005) and 330 gallons of hazardous waste (D001 and F003) on manifest 010248114 JJK on January 11, 2013.

There was one 90-day hazardous waste container storage area observed at the facility at the time of the inspection. There was no satellite accumulation areas (SAA) observed at the time of the inspection. There were no hazardous waste tanks observed at the time of the inspection.

The main waste streams that were regularly (historically) generated at Cass Polymers consisted of: polyester resin waste (D001/D005); flammable waste solvent (D001/F003); parts washer waste solvent; and flammable polyester paste. The hazardous waste codes associated with the main hazardous waste types that were generated at Cass Polymers consisted of: D001, D005, D039, and F003. There are universal waste fluorescent and metal halide bulbs (Cleanlites picks up for recycling) that are generated at the facility. The facility had not shipped out any used CRTs. There are no batteries generated at the facility. There was no used oil accumulated at the facility. The facility's air compressor is serviced by an outside vendor.

There were fire extinguishers, spill containment kits, decontamination equipment that were inspected and phones in place throughout the facility. The fire extinguishers are inspected regularly.

Site Tour

A physical walk-through of the facility was conducted. We started at the Staging Area. There were approximately twenty 55-gallon drums and approximately fifty 5-gallon containers, situated on pallets, which were in pending waste characterization status as stated by Mr. Goodrich. The material had been accumulated approximately two months as stated by Mr. Goodrich. Pictures were taken.

In the same area, there were several containers, situated on approximately six pallets, which contained product to be sent to the Eaton Rapids Axson Technologies (Axson) facility and utilized at that facility as stated by Mr. Goodrich. There were approximately thirty-six 55-gallon drums that contained product to be sent to Axson and utilized there as stated by Mr. Goodrich. There were approximately eighty 55-gallon drums that contained finished product as stated by Mr. Goodrich. A picture was taken.

Next, we inspected the Maintenance Shop. There were several containers that contained product that will be sent to and utilized at Axson as stated by Mr. Goodrich.

At the Raw Material Storage area, there were approximately thirty-three 55-gallon drums that contained product as stated by Mr. Goodrich. There were 1-gallon and 2-gallon containers, situated on two pallets, which contained product to be utilized at Axson as stated by Mr. Goodrich. There were several bags, situated on a pallet, which contained product silica sand as stated by Mr. Goodrich. There were several boxes, situated on four pallets, which contained raw material product as stated by Mr. Goodrich. Also, there were four 55-gallon drums, situated on a pallet, which contained raw material product as stated by Mr. Goodrich.

Next, we inspected the Packaging/Manufacturing area. There was one 40-gallon drum observed. Mr. Goodrich was not aware of the drum's contents. A picture was taken. Later, during the inspection Mr. Goodrich learned that the drum contained product oil for a reactor. There was one bulk product tank that contained product epoxy resin as stated by Mr. Goodrich. The product epoxy resin is to be emptied into totes and shipped to and utilized at Axson as stated by Mr. Goodrich. There was one 55-gallon drum that contained product acetone as stated by Mr. Goodrich. There were eight 55-gallon drums that contained product epoxy resin as stated by Mr. Goodrich. Also, there were several empty drums in this area.

At the Lab, there was no waste observed at the time of the inspection.

Adjacent to the Lab, there were several bags, situated on two pallets, which contained finished product as stated by Mr. Goodrich.

Next, we inspected the Quarantine Area. There were three 55-gallon drums and approximately fifty 1-quart containers that contained epoxy resin and hardeners that will be reworked as product material at Axson as stated by Mr. Goodrich. A picture was taken.

At the 90-day Hazardous Waste Container Storage Area, there were three 55-gallon drums that contained non-hazardous waste epoxy hardener, and five 55-gallon drums that contained non-hazardous waste epoxy resin as stated by Mr. Goodrich. There were two 5-gallon buckets that contained non-hazardous epoxy resin as stated by Mr. Goodrich. There were two 55-gallon drums that contained product resin as stated by Mr. Goodrich. There was one 5-gallon container that contained product resin as stated by Mr. Goodrich. On shelves, there were several 2-gallon and 5-gallon containers that contained product as stated by Mr. Goodrich.

Next, we inspected the Maintenance Area. There was one 30-gallon container that contained spent metal halide bulbs. The container was labeled as "Waste Metal Hail Bulbs", was dated 3/20/12, and was closed. Two pictures were taken. Mr. Willbur stated that the date on the container label was not accurate since the spent bulbs in the container were accumulated for approximately three months. Also, there were four 8-foot spent fluorescent bulbs that were not contained or labeled. A picture was taken. Mr. Willbur stated that the four spent bulbs were accumulated for approximately three months.

Record Review

The review of records was conducted at approximately 10:20 a.m. There were no manifests retained on-site as stated by Mr. Goodrich. The manifests had been sent to Cass Polymers' Madison Heights, Michigan facility as stated by Mr. Goodrich. Mr. Goodrich stated that documentation of the last three years of retained manifests including all LDR notices for each waste stream would be forthcoming after the inspection. The recent manifest activity documented in MDEQ's Waste Data System (WDS) shows that all hazardous waste was sent to the following TSDF(s): EQ Detroit, Inc. (MID980991566) and Safety-Kleen Systems, Inc. (ILD980613913). The following transporters were also used: Safety-Kleen Systems, Inc. (TXR000081205). The most recent hazardous waste shipment occurred on March 4, 2013 according to the WDS.

Waste determinations were documented either through analysis/waste profile or generator knowledge and MSDS. The MSDS was reviewed for EA-607 Resin (bisphenol-A epoxy resin blend). The MSDS was reviewed for EL-323TC Resin (epoxy resin blend). The MSDS was reviewed for EL-301 Hardener. The MSDS was reviewed for EL-319 Fast Hardener.

The weekly inspections for the hazardous waste container storage area and the emergency equipment at Cass Polymers were being conducted and were documented. At least the last three years of inspection documentation records were retained.

There was a contingency plan in place for the facility and the plan was reviewed. The plan had been sent out to the required authorities as indicated in the plan and was stated by Mr. Goodrich.

There was a RCRA hazardous waste management training program in place at the facility. The RCRA trainings are conducted in-house. The RCRA training curriculum and the sign-in sheets that documented that the RCRA trainings were received were available and were reviewed. However, there was no RCRA training documented for 2013. The last documented RCRA training occurred on January 18, 2012.

The biennial hazardous waste reports were retained on-site and had been submitted.

Closing Conference

I summarized the RCRA requirements for the following: universal waste management; retention of manifest copies; and documented annual training (not for 2013). The inspection concluded at approximately 11:20 a.m.

Cass Polymers made no claim of confidential business information related to any information obtained, documents received, or any pictures taken by U.S. EPA during the inspection.

Documents received during this inspection are as follows:

- Copies of the following MSDS:
- EA-607 Resin (bisphenol-A epoxy resin blend)
- EL-323TC Resin (epoxy resin blend)
- EL-301 Hardener
- EL-319 Fast Hardener

Documents given to Cass Polymers during or after this inspection are as follows:

- U.S. EPA Small Business Resources handout (compliance assistance)
- Region 5 and State Pollution Prevention contact handout
- Michigan RETAP handout

A photo log is attached consisting of nine (9) photos taken by U.S. EPA during the inspection.

1. A view at the Staging Area, of approximately twenty 55-gallon drums and approximately fifty 5-gallon containers, situated on pallets, which were in pending waste characterization status as stated by Mr. Goodrich. The material had been accumulated approximately two months as stated by Mr. Goodrich.

Cass Polymers of Michigan, Inc., Charlotte, MI
Bryan Gangwisch, U.S. EPA 12/12/13

2. Another view at the Staging Area, of the drums and containers, situated on pallets, which were in pending waste characterization status as stated by Mr. Goodrich. The material had been accumulated approximately two months as stated by Mr. Goodrich.

Cass Polymers of Michigan, Inc., Charlotte, MI
Bryan Gangwisch, U.S. EPA 12/12/13

3. Another view at the Staging Area, of the drums and containers, situated on pallets, which were in pending waste characterization status as stated by Mr. Goodrich.

Cass Polymers of Michigan, Inc., Charlotte, MI
Bryan Gangwisch, U.S. EPA 12/12/13

4. A view at the Staging Area, of approximately eighty 55-gallon drums that contained finished product as stated by Mr. Goodrich.

Cass Polymers of Michigan, Inc., Charlotte, MI
Bryan Gangwisch, U.S. EPA 12/12/13

5. A view at the Packaging/Manufacturing area, of one 40-gallon drum. Mr. Goodrich was not aware of the drum's contents. Later, during the inspection Mr. Goodrich learned that the drum contained product oil for a reactor.

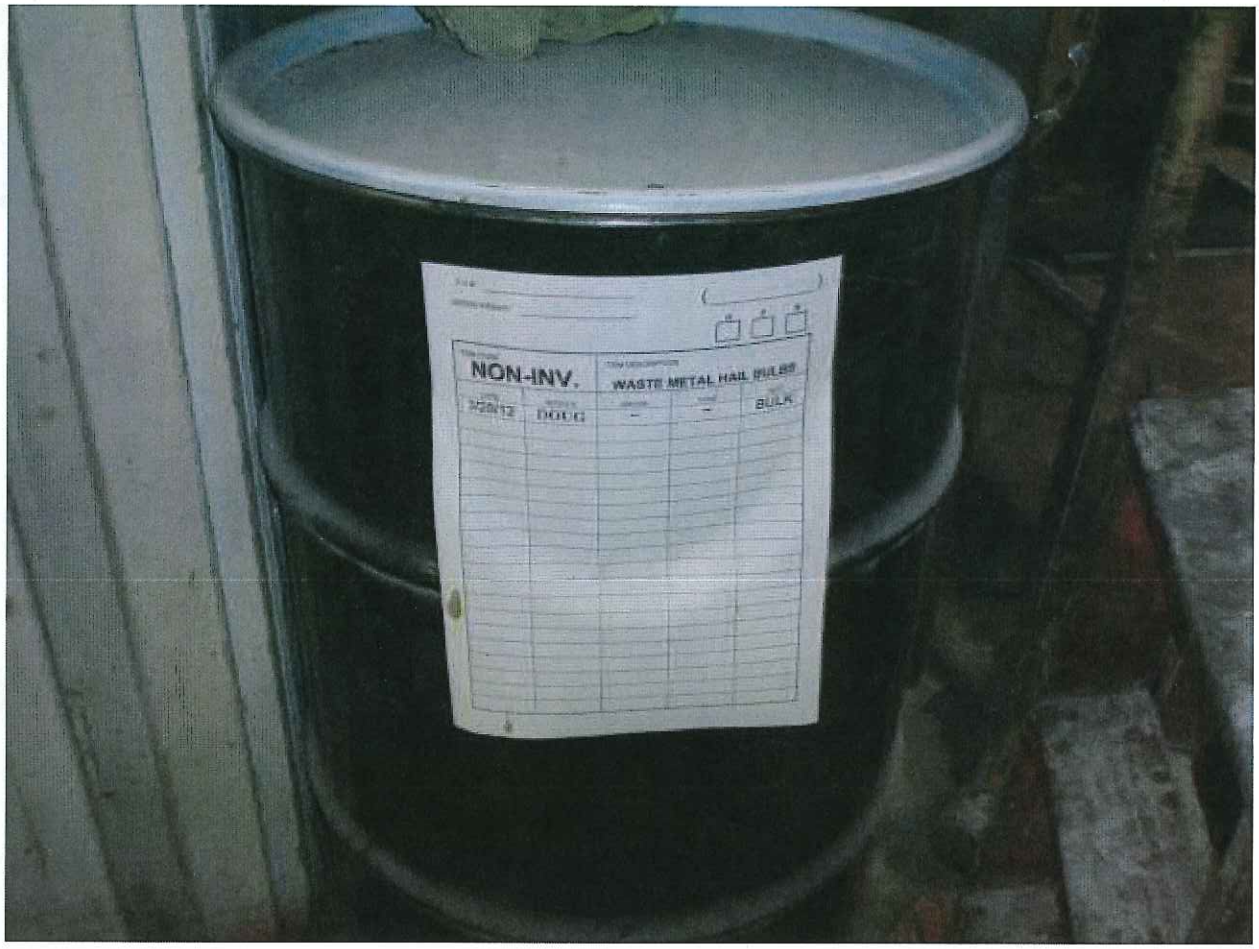
Cass Polymers of Michigan, Inc., Charlotte, MI
Bryan Gangwisch, U.S. EPA 12/12/13

6. A view at the Quarantine Area, of three 55-gallon drums and approximately fifty 1-quart containers that contained epoxy resin and hardeners that will be reworked as product material at Axson as stated by Mr. Goodrich.

Cass Polymers of Michigan, Inc., Charlotte, MI
Bryan Gangwisch, U.S. EPA 12/12/13

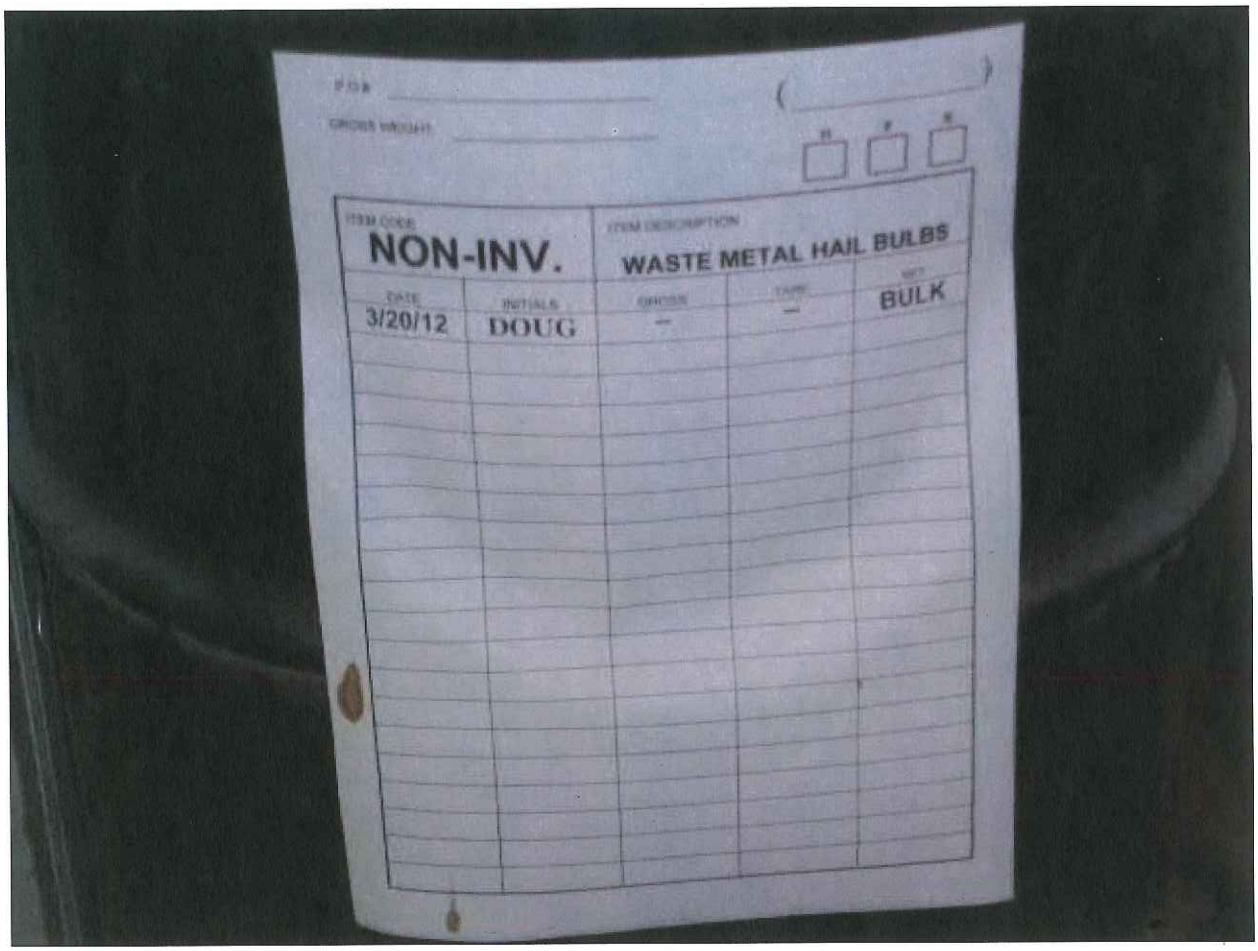
7. A view at the Maintenance Area, of four 8-foot spent fluorescent bulbs that were not contained or labeled. Mr. Willbur stated that the four spent bulbs were accumulated for approximately three months.

Cass Polymers of Michigan, Inc., Charlotte, MI
Bryan Gangwisch, U.S. EPA 12/12/13



8. A view at the Maintenance Area, of one 30-gallon container that contained spent metal halide bulbs. The container was labeled as "Waste Metal Hail Bulbs", was dated 3/20/12, and was closed. Mr. Willbur stated that the date on the container label was not accurate since the spent bulbs in the container were accumulated for approximately three months.

Cass Polymers of Michigan, Inc., Charlotte, MI
Bryan Gangwisch, U.S. EPA 12/12/13



9. Another view at the Maintenance Area, of the same drum (as above in photo # 8).

Cass Polymers of Michigan, Inc., Charlotte, MI
Bryan Gangwisch, U.S. EPA 12/12/13

Department of Environmental Quality
FULLY REGULATED GENERATOR (FRG) INSPECTION FORM

Facility's Name Cass Polymers of Michigan, Inc. Part 3 Rules

Date 12/12/13 ID# MID985606508 1994 PA 451

HAZARDOUS WASTE AND WASTE #	SOURCE	HOW MUCH
Polyester resin waste D001/D005	Mfg. waste	LQG amounts
Flammable waste solvent D001/F003	Mfg. waste	LQG amounts
Parts washer waste solvent D039	parts washer	Approx 60 g/year
Flammable polyester paste D001	Mfg. waste	varies

___ abbreviated

FACILITY COMPLIANCE REQUIRED IN ALL AREAS

WASTE DETERMINATION (Rule 302: 40 CFR 262.11

(NI = Not inspected; N/A = Not applicable)

		YES	NO	
1. Determined if waste streams are hazardous waste? (Rule 302: 40 CFR 262.11))	262A	[X]	___	NI N/A
a) copy of waste evaluation on-site 3 years? (Rule 307(1): 40 CFR 262.40(c))	262D	[X]	___	NI N/A
b) re-evaluated waste when changes in materials or process? (Rule 302(3))	262A	[X]	___	NI N/A
2. Did generator have written waste analysis plan if treating wastes on-site? (Rule 306)(1)(d):40 CFR 268.7(a)(5))	262C	[ ]	___	NI (N/A)

IDENTIFICATION NUMBER (Rule 303: 40 CFR 262.12)

3. Has the generator obtained an identification number? (Rule 303: 40 CFR 262.12)	262A	[X]	___	NI N/A

MANIFEST REQUIREMENTS (Rule 304: 40 CFR 262.20)

4. Copies of the manifest readily available for review & inspection? (Section 11138(1)(f))	FSS	[ ]	X	NI N/A
5. Manifests kept for the past 3 years? (Rule 307(3): 40 CFR 262.20(a)) copies not kept on-site	262D	[ ]	X	NI N/A
6. Manifests, prepared by the generator according to instructions in appendix of Part 262 contain the following:				
a) manifest document number (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	[X]	___	NI N/A
b) generator's name, address, phone & ID # (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	[X]	___	NI N/A
c) name & ID # of the transporter. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	[X]	___	NI N/A
d) name, address & ID # of TSDF. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	[X]	___	NI N/A
e) DOT description of waste(s). (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	[X]	___	NI N/A
f) quantity of waste, type & # of containers. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	[X]	___	NI N/A
g) hazardous waste number of the wastes. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	[X]	___	NI N/A
h) generator signature, initial transporter & date of acceptance. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	[X]	___	NI N/A
7. **NOT APPLICABLE**				
8. For out-of-state manifests, if not submitted by designated facility, generator submitted copy of 3rd signature manifest as requested by Director? (Rule 304(2)(c))	262B	[X]	___	NI N/A
9. Is the transporter used properly registered &/or permitted under Act 138, Sec. 2 (3)? (Rule 304(1)(c))	262B	[X]	___	NI N/A

***NOTE**: For shipments of hazardous waste solely by water or rail shipments, within United States see Rule 304(4)(g or h).*

10. Using manifest that has expired? (Rule 304(1)(a) : 40 CFR 262.20)	262B	___	[X]	NI N/A
11. Reportable exceptions (Rule 308(3): 40 CFR 262.42)(a).				
a) number of manifests generator HASN'T receive signed copy from TSD w/in 35 days:		0		
b) number of manifests generator HASN'T submitted exception reports to RA & DEQ after 45 days:		0		
12. Facility has written program to reduce volume/toxicity/recycle wastes? (Rule 304(1)(b):40 CFR 262.27(a))	262B	[X]	___	NI N/A

13. Facility discusses program in place to reduce volume/toxicity/recycle of waste (Rule 304(1)(b): 40 CFR 262.27(a))	262B	[X]	___	NI N/A

LAND DISPOSAL RESTRICTION REQUIREMENTS
WASTE ANALYSIS AND RECORDKEEPING (Rule 311(1): 40 CFR 268.7))

		YES NO
14. Did the generator determine if the waste is restricted from land disposal? (Rule 311(1): 40 CFR 268.7(a)(1))		
a) all listed waste	**268A**	[X] ___ NI N/A
b) all characteristic wastes?	**268A**	[X] ___ NI N/A

NOTE: *If waste has both listed & characteristic waste codes, the treatment standard for the listed waste is sufficient if the treatment standards for the listed waste includes a standard for the constituent that caused the waste to exhibit the characteristic, except for D001 and D002. (40 CFR 268.9(b))*

15. If restricted waste exceeds treatment standards or prohibitions did notice go w/ initial shipment? (Rule 311(1):40 CFR 268.7(a)(2))	**268A**	[X] ___ NI N/A
OR		
16. If restricted waste does not exceed treatment standards or prohibitions did a notice and certification statement go with initial shipment? (Rule 311(1): (40 CFR 268.7(a)(3))	**268A**	[ ] ___ NI (N/A)
OR		
17. If waste has exemption from prohibition on the type of land disposal method utilized for the waste, did a notice go with initial shipment? (Rule 311(1): 40 CFR 268.7(a)(4))	**268A**	[ ] ___ NI (N/A)
OR		
18. If facility choose alternative treatment standard for lab pack that contains none of the waste in appendix IV, did a notice & certification go with initial shipment? (Rule 311(1): 40 CFR 268.7(a)(9))	**268A**	[ ] ___ NI (N/A)
19. Did the notice include: (Rule 311(1): 40 CFR 268.7(a)(1) or 268.7(a)(2) or 268.7(a)(3)		
a) EPA hazardous waste #?	**268A**	[X] ___ NI N/A
b) if wastewater or non-wastewater as defined in 268.2(d&f)?	**268A**	[X] ___ NI N/A
c) subcategory of the waste (such as D003 reactive cyanide) if applicable?	**268A**	[X] ___ NI N/A
d) manifest number associated with the shipment?	**268A**	[X] ___ NI N/A
e) waste analysis data, where available?	**268A**	[X] ___ NI N/A
f) waste constituents that the treater will monitor, if monitoring will not include all regulated constituents, for F001- F005, F039, D001, D002, D012-D043? (treatment standards for hazardous waste in table in 268.40 for the waste code under regulated constituents)	**268A**	[X] ___ NI N/A
UNLESS		
g) did generator/treater claim they are going to monitor for ALL regulated constituents in the waste in lieu of the generator indicating same in the notice? (Rule 311(1): 40 CFR 268.7(a)(1) & 268.9)	**268A**	[ ] ___ NI (N/A)
h) did generator/treater claim they are going to monitor for underlying hazardous waste constituents (except vanadium and zinc), reasonably expected to be present at the generation point, above UTS standards for D001, D002 & TCLP organics? Rule 311(1): 40 CFR 268 Subpart D & 268.48)	**268A**	[ ] ___ NI (N/A)
20. Other than notices for waste exceeding treatment standards, did notices include: (Rule 311(1): 40 CFR 268.7(2)(3)		
a) if the notice is for shipments that meet the standards does the notice include the certification?	**268A**	[ ] ___ NI (N/A)
b) if the notice is for shipments under prohibitions does the notice include a statement that the waste isn't prohibited from land disposal & date the waste is subject to prohibition?	**268A**	[ ] ___ NI (N/A)

NOTE: *An alternate treatment standard may be used after approval from the Administrator. (40 CFR 268.44)*
NOTE: *Hazardous waste debris see 40 CFR 268.7(a)(1)(iv) for the notice requirements which must be followed by the statement "This hazardous debris is subject to alternative treatment standards of 40 CFR 268.45."*

21. Generator retain on-site records to support determination from knowledge or results from tests? (40 CFR 268.7(a)(6)	**268A**	[X] ___ NI N/A
22. If the restricted waste is excluded from being a hazardous waste or solid waste did the generator place a one- time notice stating same in the facility file? (40 CFR268.7(a)(7))	**268A**	[ ] ___ NI (N/A)
23. All notices/certifications/demonstrations/other documents retained for 3 years on-site? (40 CFR 268.7(a)(8)	**268A**	[ ] X NI N/A

NOTE: *This requirement (268.7(a)(8)) applies to solid waste even when the hazardous waste characteristic is removed prior to disposal or when the waste is excluded from the definition of hazardous waste or solid waste.*

DILUTION PROHIBITED AS SUBSTITUTE FOR TREATMENT (RULE 311(1):40 CFR 268.3)

24. Generator dilute hazardous waste or treatment residue of a hazardous waste to avoid prohibition? (40 CFR: 268.3(a))	**268A**	___ [X] NI N/A

TREATMENT STANDARDS (RULE 311(1):40 CFR 268.40)

25. If wastes exceeding treatment standards are mixed, was the most stringent standards selected? (40 CFR268.40(c))	**268A**	[ ] ___ NI (N/A)

BIENNIAL REPORT (Rule 308: 40 CFR 262.41)

26. Generator submitted biennial report by 3/1 (even years)? (Rule 308(1): 40 CFR 262.41)	**262D**	[X] ___ NI N/A
27. Were copies of the report retained at least 3 years? (Rule 307(4): 40 CFR 262.40(b))	**262D**	[X] ___ NI N/A

PRE-TRANSPORTER REQUIREMENTS (Rule 305: 40 CFR 262.30)		YES NO
28. Waste packaged according to DOT regulations (required before shipping waste off-site)? (Rule 305(1)(a):40 CFR262.30))	262C	co.said X obsrvd__ [X] ___ NI N/A
29. Are waste packages marked & labeled per DOT 49 CFR172 concerning hazardous materials (required before shipping waste off- site)?(Rule 305(1)(b)(c): 40 CFR 262.32(a))	262C	co.said X obsrvd__ [X] ___ NI N/A
30. On containers of 119 gallons or less, is there a warning, generator's name, address, site identification number, manifest tracking number & waste code per DOT 49 CFR172.304? (Rule 305(1)(d): 40 CFR 262.32(b))	262C	co.said X obsrvd__ [X] ___ NI N/A
31. If required (>1000 #'s), are placards available to the transporter? (Rule 305(1)(e): 40 CFR 262.33)	262C	[X] ___ NI N/A

ACCUMULATION TIME (Rule 306: 40 CFR 262.34)		
32. If hazardous waste accumulated in containers: (If no, skip to #35) No hazardous waste in accumulation at time of inspection		
a) containers have accumulation date which is clearly visible? (Rule 306(1)(b): 40 CFR 262.34(a)(2))	262C	[ ] ___ NI N/A
b) container have words "Hazardous Waste"? (Rule 306(1)(c): 40 CFR 262.34(a)(3))	262C	[ ] ___ NI N/A
c) is each container clearly marked with the hazardous waste number? (Rule 306(1)(b))	262C	[ ] ___ NI N/A
d) has more than 90 days elapsed since date marked? (Rule 306(1)	262C	___ [ ] NI N/A
OR		
e) one of the following apply:		
i) the generator applied for & received an extension to accumulate longer? (Rule 306(3): 40 CFR 262.34(b))	262C	[ ] ___ NI N/A
ii) it is F006 waste recycled for metals recovery in compliance with Rule 306 (7) (180 days maximum). Rule 306(7):40 CFR 262.34(g))	262C	[ ] ___ NI N/A
iii) it is F006 waste recycled for metals recovery in compliance with Rule 306(7) which must be transported more than 200 miles (270 days max.)? (Rule 306(8):40 CFR 262.34(h)	262C	[ ] ___ NI N/A
iv) generator applied for & received extension or exception to accumulate F006 haz waste longer than ii or iii above? (Rule 306(9-10):40 CFR 262.34(i))	262C	[ ] ___ NI N/A

The following Subpart I, 265.170 to 265.177 requirements are referred to by Rule 306(1)(a) and 40 CFR 262.34(a)(1).

f) are containers in good condition? (265.171)	262C	[ ] ___ NI N/A
g) are containers compatible with waste in them (265.172)	262C	[ ] ___ NI N/A
h) are containers stored closed? (265.173(a))	262C	[ ] ___ NI N/A
i) containers handled/stored in a way which may rupture it or cause leaks? (265.173(b)	262C	___ [ ] NI N/A
j) ignitable & reactive wastes stored 15 meters (50 feet) from property line or written approval obtained from local fire prevention code authority for less than 15 meter? (265.176)	262C	[ ] ___ NI N/A
k) are containers inspected weekly for leaks and defects? (265.174)	262C	[X] ___ NI N/A
l) did the generator document the inspections in 32(k)? (Rule 306(1)(a)(i))	262C	[X] ___ NI N/A
m) inspection documents maintained on-site 3 years? (Rule 306(1)(a)(i))	262C	[X] ___ NI N/A
n) are incompatible wastes stored in separate containers? (265.177(a))	262C	[ ] ___ NI N/A
o) hazardous wastes put in unwashed containers that previously held incompatible waste. (265.177(b))	262C	___ [ ] NI N/A
p) incompatible waste separated/protected from each other by physical barriers or sufficient distance? (265.177(c))	262C	[ ] ___ NI N/A

Rule 306(2) & 40 CFR 262.34(c)(1) both refer to 40 CFR 265.171, 265.172 & 265.173(a).

33. If hazardous waste is being accumulated at the point of generation: No SAA's at time of inspection		
a) container(s) <55 gal or 1 qt acutely/severely toxic? (Rule 306(2):40 CFR 262.34(c)(1))	262C	[ ] ___ NI N/A
b) container(s) under operator control & near the point of generation? (Rule 306(2): 40 CFR 262.34(c)(1))	262C	[ ] ___ NI N/A
c) container(s) have words "Hazardous Waste"? (Rule 306(2): 40 CFR 262.34(c)(1)(ii))	262C	[ ] ___ NI N/A
d) are the container(s) marked with the hazardous waste number or chemical name? (Rule 306(2))	262C	[ ] ___ NI N/A
e) are container(s) in good condition? (265.171)	262C	[ ] ___ NI N/A
f) are container(s) compatible with waste in them? (265.172)	262C	[ ] ___ NI N/A
g) container(s) closed when not in use & managed to prevent leaks? (265.173(a))	262C	[ ] ___ NI N/A
34. If generator exceeds 55 gallons or 1 quart, w/in 3 days does generator, w/respect to that amount of excess waste:		
a) mark the container with the date the excess amount began accumulating? (Rule 306(2): 40 CFR 262.34(c)(2))	262C	[ ] ___ NI N/A
b) move to an area with secondary containment, if required? (Rule 306(1): 40 CFR 264.175))	262C	[ ] ___ NI N/A

Rule 306(1)(a) refers to containment requirements in 40 CFR 264.175.

35. If accumulating free liquids or any F020, F021, F022, F023, F026, F027, does the hazardous waste storage area include No hazardous waste in accumulation		
a) impervious base free of cracks? (264.175(b)(1)) :	262C	[ ] ___ NI N/A

b) sloped or otherwise designed to elevate/protect containers from contact with liquids? (264.175(b)(2))	**262C**	[ ] ___	NI N/A
c) hold 10% of volume of containers or volume of the largest container, whichever is greater? (264.175(b)(3))	**262C**	[ ] ___	NI N/A
d) run-on prevented unless sufficient capacity? (264.175(b)(4))	**262C**	[ ] ___	NI N/A
e) accumulated liquids removed in a timely manner to prevent overflow? (264.175(b)5))	**262C**	[ ] ___	NI N/A

NOTE: *Closure of Accumulation Area covered under # 53.*

36. If accumulating solids, (other than F020,F021,F022, F023, F026, F027), is haz waste accumulation area sloped or otherwise designed, or containers elevated or otherwise protected from contact with liquids? (264.175(c)(1 & 2))	**262C**	[ ] ___	NI N/A
37. Is hazardous waste accumulated in other than tanks or containers? Or, is hazardous waste generated but not accumulated, i.e.: process tank? No *Explain any yes answer.*		___ X	NI N/A
38. Waste area protected from weather, fire, physical damage & vandals? (Rule 306(1)(e))	**262C**	[X] ___	NI N/A
39. Hazardous waste accumulated so no hazardous waste or hazardous waste constituent can escape by gravity into soil, directly or indirectly, into surface, ground-waters, drains or sewers, and such that fugitive emissions do not violate Act 451, Part 55? (Rule 306(1)(f))	**262C**	[ ] ___	NI N/A
40. Is hazardous waste accumulated in tanks? No *If so, complete Tank System inspection form.*		___ X	NI N/A
41. Is hazardous waste placed on drip pads? No *If so, complete Wood Preserving inspection form*		___ X	NI N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refers to 265.16
PERSONNEL TRAINING (265.16)

42. Did personnel receive training? (265.16)	**262C**	[X] ___	NI N/A
43. Do personnel training records contain the following:			
a) job title? (265.16(d)(1))	**262C**	[X] ___	NI N/A
b) job descriptions? (265.16(d)(2))	**262C**	[X] ___	NI N/A
c) name of employee filling each job? (265.16(d)(1))	**262C**	[X] ___	NI N/A
d) description of type & amount of both introductory & continued training? 265.16(d)(3))	**262C**	[X] ___	NI N/A
e) training designed so facility personnel can respond to emergencies? (265.16(a)(3)	**262C**	[X] ___	NI N/A
f) records of training? (265.16(d)(4))	**262C**	[ ] X	NI N/A
g) do new personnel receive required training within 6 months? (265.16(b)	**262C**	[X] ___	NI N/A
h) do training records show personnel have taken part in annual training? (265.16(c))	**262C**	[ ] X	NI N/A
i) training by person trained in hazardous waste management procedures? (265.16(a))	**262C**	[X] ___	NI N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refer to 265, Subpart C, 265.30-265.37.
PREPAREDNESS AND PREVENTION (265.30-265.37)

44. Facility maintained/operated to minimize possibility of fire, explosion, release of hazardous waste or hazardous waste constituent which could threaten human health/environment? (265.31)	**262C**	co.said__obsrvd_ [X] ___	NI N/A
45. If required, does this facility have the following:			
a) internal communications or alarm systems? (265.32(a))	**262C**	[X] ___	NI N/A
b) telephone or 2-way radios at the scene of operations? (265.32(b))	**262C**	[X] ___	NI N/A
c) portable fire extinguishers, fire control, spill control equipment and decontamination equipment? (265.32(c))	**262C**	[X] ___	NI N/A
d) adequate volume of water and/or foam available for fire control? (265.32(d))	**262C**	[X] ___	NI N/A
46. Testing and Maintenance of Emergency Equipment			
a) owner/operator test & maintain emergency equipment to assure operation? (265.33)	**262C**	[X] ___	NI N/A
b) has owner/operator provided immediate access to internal alarms? Access to alarm system is applicable **only** if required (40 CFR 265. 32)			
i) when hazardous waste is being poured, mixed, etc. (265.34(a))	**262C**	[X] ___	NI N/A
ii) if only one employee on the premises while facility is operating. (265.34(b))	**262C**	[X] ___	NI N/A
c) aisle space for unobstructed movement of personnel/emergency equipment? (265.35)	**262C**	[X] ___	NI N/A
47. Has the facility made arrangements with local authorities? (265.37(a)&(b))	**262C**	[X] ___	NI N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refer to Subpart D, 265.50-265.56.
CONTINGENCY PLAN AND EMERGENCY PROCEDURES (265.50-265.56)

48. Plan implemented whenever fire/explosion/release could threaten human health or the environment? (265.51(b))	**262C**	[X] ___	NI N/A
49. Does the contingency plan contain the following:			
a) actions personnel must take responding to fires/explosions/unplanned release of hazardous waste? (265.52(a & b))	**262C**	[X] ___	NI N/A
b) describe arrangements w/ local police, fire, hospitals, contractors, state & local emergency responders for emergency services; (265.52(c)) & (265.37(a)&(b))?	**262C**	[X] ___	NI N/A

c) name, addresses & phone (office & home) of emergency coordinator? (265.52)(d))	262C	[X] ___	NI N/A
d) list emergency equipment at the facility, including location, physical description & capabilities? (265.52(e))	262C	[X] ___	NI N/A
e) evacuation plan for personnel w/ signal(s), evacuation routes & alternate evacuation routes. (265.52(f))	262C	[X] ___	NI N/A
50. Does the facility have an Emergency Coordinator? (265.55) Mr. Goodrich	262C	[X] ___	NI N/A
Emergency Coordinator and Emergency Procedures:			
a) emergency coordinator familiar with site operation & emergency procedures? (265.55)	262C	[X] ___	NI N/A
b) emergency coordinator has the authority to carry out the contingency plan? (265.55)	262C	[X] ___	NI N/A
c) if emergency occurred, did the emergency coordinator follow emergency procedures? (265.56)	262C	[ ] ___	NI (N/A)
d) fire/explosion/other release of hazardous waste/haz. waste constituents, could threaten human health or environment or generator has knowledge spill reached surface or ground water, did generator notify MDEQ? (Rule 306(1)(d))	262C	[ ] ___	NI (N/A)
51. Contingency plan Amendments and Copies			
a) amended: fails in emergency; changes in regulations/emergency coordinators/emergency equipment? (265.54)	262C	[ ] ___	NI (N/A)
b) copies of plan on site and sent to local emergency organizations? (265.53)	262C	[X] ___	NI N/A

Rule 309 refers to 262, Subpart E except 262.54 & 262.55

INTERNATIONAL SHIPMENTS (Rule 309 & 310: 40 CFR 262.50-262.60)

52. Has the facility imported or exported hazardous waste?		___ X	NI N/A
a) exporting, has the generator:			
i) notified the Administrator in writing <12 months prior to shipment? (Rule 309(1): 40 CFR 262.53(a))	262E	[ ] ___	NI N/A
ii) receiving country consented to accept waste. (Rule 309(1): 40 CFR 262.52(b))	262E	[ ] ___	NI N/A
iii) has copy of EPA Acknowledgment of Consent. (Rule 309(1): 40 CFR 262.52(c))	262E	[ ] ___	NI N/A
iv) complied with manifest requirements in Rule 309(2)(a-h).	262E	[ ] ___	NI N/A
v) if required, was an exception report filled. (309(3)(a-c))	262E	[ ] ___	NI N/A
b) importing, has the generator met manifest requirements? (Rule 310: 40 CFR 262.60)	262F	[ ] ___	NI N/A

Rule 306(1)(g) and 40 CFR 262.34(a)(1) refers to 40 CFR 265.111 & 265.114

ACCUMULATION AREA CLOSURE (265.111 & 265.114)

53. The accumulation area must be closed in a manner that:			
a) minimizes need for further maintenance (Rule 306(1)(g): 40 CFR 265.111(a))	262C	[ ] ___	NI N/A
b) controls/minimizes/eliminates, to protect human health & environment, the escape of haz. waste or hazardous waste constituents, leachate, run-off to ground/surface waters and air. (Rule 306(1)(g): 40 CFR 265.111(b))	262C	[ ] ___	NI N/A
c) all contaminated equipment, structures, and soil properly disposed of. (Rule 306(1)(g): 40 CFR 265.114)	262C	[ ] ___	NI N/A

COMMENTS:

Department of Environmental Quality
UNIVERSAL WASTE SMALL QUANTITY HANDLER (SQH) INSPECTION

Facility Name Cass Polymers of Michigan, Inc. Part 2 Rules

Date 12/12/13 I.D. # MID985606508 1994 PA 451

SQH may choose to manage the following as universal waste when they accumulate quantities of 5000 kg (11,000 lbs) or less of all these wastes on site: antifreeze; batteries [except lead acid batteries managed per R 299.9804]; consumer electronics (devices containing circuit boards, liquid crystal display, or plasma display); electric lamps [fluorescent, high intensity discharge (HID), sodium vapor, mercury vapor, neon, metal halide, incandescent lamps, and cathode ray tubes (CRTs) from computers, televisions, etc.]; mercury items: thermostats, mercury switches, mercury thermometers, waste devices containing only elemental mercury; various pesticides; pharmaceuticals.

Yes/No responses that are outside of the parenthesis are violations.

(NI - Not Inspected N/A - Not Applicable)

PROHIBITIONS (Rule 228(4): 40 CFR 273.11)		YES NO
1. Does SQH dispose of universal waste? (Rule 228(4): 40 CFR 273.11(a))	273.B	___ [X] NI N/A
2. Does SQH dilute or treat universal waste, except responding to releases or managing certain waste when included below? (Rule 228(4): 40 CFR 273.11(b))	273.B	___ [X] NI N/A

WASTE MANAGEMENT (Rule 228(4): 40 CFR 273.13, 273.14)

ANTIFREEZE: (Rule 228(4)		QTY HANDLED: ___
3. Is antifreeze managed in manner to prevent release by containing it in structurally sound packaging that is compatible w/ contents, & kept closed? Are transport vehicles & vessels managed in the same way? (Rule 228(4)(h))	273.B	[ ] ___ NI N/A
4. Do containers show evidence of leakage, spillage, or damage? If so, are these containers over packed in a container that meets requirements? (Rule 228(4)(h)(ii)(B))	273.B	[ ] ___ NI N/A
5. If tanks are used to store antifreeze, do they meet requirements in 40 CFR 265 Subpart J except 265.197(c), 265.200, & 265.201? (Rule 228(4) (h) (ii) (C). **[USE TANK CHECKLIST]**	273.B	[ ] ___ NI N/A
6. Are containers labeled "UNIVERSAL WASTE ANTIFREEZE" or "WASTE ANTIFREEZE" or "USED ANTIFREEZE"? (Rule 228(4)(h)(iv))	273.B	[ ] ___ NI N/A
7. If a release occurred, was it immediately cleaned up & properly characterized for disposal? (Rule 228(4)(e)(ii))	273.B	[ ] ___ NI N/A

BATTERIES: (Rule 228(4) adopts 40 CFR 273 except 273.10 &273.18(h) requirements)		QTY HANDLED: ___
8. Are batteries managed in way to prevent releases? (Rule 228(4)(a): 40 CFR 273.13(a)	273.B	[ ] ___ NI N/A
9. Are batteries that show evidence of leakage, spillage, or damage that could cause leaks put in containers that are kept closed, structurally sound, compatible w/ contents of battery, & lack evidence of leakage, spillage or damage that could cause leakage? (Rule 228(4): 40 CFR 273.13(a)(1))	273.B	[ ] ___ NI N/A
10. Does the handler do any of the following activities w/ batteries as long as the casings of each battery is not breached & remain intact & closed (except to remove electrolyte): sort by type, mix types in container, discharge to remove electric charge, regenerate, disassemble into individual batteries or cells, remove from consumer products, or remove electrolyte? (Rule 228(4)(a): 40 CFR 273.13(a)(2))	273.B	[ ] ___ NI N/A
11. If electrolyte is removed or other wastes generated from activities in item 10, has it been determined whether it is hazardous waste? (Rule 228(4)(a): 40 CFR 273.13(a)(3))	273.B	[ ] ___ NI N/A
a. If electrolyte or other waste is hazardous waste, is it managed in compliance with Parts 260-272 and Part 111? (Rule 228(4)(a): 40 CFR 273.13(a)(3))	273.B	[ ] ___ NI N/A
b. If electrolyte or other waste is not hazardous waste, is it managed in compliance with Parts 31, 115 or 121 of 451 & local requirements? (Rule 228(4)(a): 40 CFR 273.13(a)(3))	273.B	[ ] ___ NI N/A
12. Are batteries or container(s) of batteries labeled w/ either: "UNIVERSAL WASTE-BATTERIES" or "WASTE BATTERIES" or "USED BATTERIES". (Rule 228(4)(a): 40 CFR 273.14(a))	273.B	[ ] ___ NI N/A

CONSUMER ELECTRONICS: (Rule 228(4)		QTY HANDLED: ___
13. Are electronics managed in a manner that prevents breakage or the release of any universal waste or components of universal waste by containing electronics in packaging that will prevent breakage during normal handling conditions? (Rule 228(4)(f)(i))	273.B	[ ] ___ NI N/A
14. Is packaging in which the electronics are contained labeled either "UNIVERSAL WASTE CONSUMER ELECTRONICS" or "UNIVERSAL WASTE ELECTRONICS"? (Rule 228(4)(f)(ii))	273.B	[ ] ___ NI N/A
15. Have releases been properly contained, & have residues been characterized, & properly disposed? (Rule 228(4)(f)(iii)	273.B	[ ] ___ NI N/A
16. Does handler do anything beyond any of the following: repair electronics for direct reuse(Rule 228(4)(g)(i); remove other univ. wastes from cons. electronics (Rule 228(4)((g)(ii)); remove modular components for reuse (Rule 228(4)(g)(iii)	273.B	[ ] ___ NI N/A

ELECTRIC LAMPS: (Rule 228(4) ;273.13(c);273.14(d))		**QTY HANDLED:**
17. Are lamps crushed or broken and facility trying to manage as universal waste? **(universal waste electric lamps shall not be crushed or broken under MI rule)** (Rule 228(4)(c)(i)) ***Note: different from EPA regulation***	273.B	___ [X] NI N/A
18. Are lamps managed in a manner to prevent breakage or the release of any universal waste or components of universal waste by containing unbroken lamps in structurally sound packaging that is compatible with contents of lamps and will prevent breakage, and packaging kept closed? (Rule 228(4(c)(ii)) 4 bulbs	273.B	[ ] X NI N/A
19. Are lamps or packaging containing lamps labeled either "UNIVERSAL WASTE ELECTRIC LAMP(S)" or "WASTE ELECTRIC LAMP(s)" or "USED ELECTRIC LAMP(s)". (Rule 228(4)(c)(iv)) ***Note: different from EPA regulation***	273.B	[ ] X NI N/A
20. Are lamp fragments or residues, & all lamps that show evidence of breakage, leakage, or damage that could cause release of mercury or other hazardous constituents to the environment immediately contained in packaging that is structurally sound & compatible w/ content, & kept closed? (Rule 228(4)(c)(iii)) ***Note: different from EPA regulation***	273.B	[ ] ___ NI N/A
21. If lamp fragments or residues are generated, has it been determined whether it is hazardous waste? (Rule 228(4)(c)(iii (B)) ***Note: different from EPA regulation which allows broken lamps to continue to be managed as universal waste***	273.B	[ ] ___ NI N/A
a. If waste is characteristic is it managed in compliance w/ Part 111, Act 451: 40 CFR Part 260-272?	273.B	[ ] ___ NI N/A
b. If waste is not characteristic is it managed in compliance w/ Part 115 of Act 451?	273.B	[ ] ___ NI N/A

MERCURY DEVICES: (Rule 228(4) ; 40 CFR 273.13 & 273.14		**QTY HANDLED:**
22. Are devices managed to prevent releases? (Rule 228 (4)(d): 40 CFR 273.13(c))	273.B	[ ] ___ NI N/A
23. Are mercury devices that show evidence of leakage, spillage, or damage that could cause leaks placed in a container that is closed, structurally sound, compatible w/ contents of device, & lack evidence of leakage, spillage or damage that could cause leakage, & designed to prevent the escape of mercury by volatilization or other means? (Rule 228 (4)(d): 40 CFR 273.13(c)(1))	273.B	[ ] ___ NI N/A
24. Are mercury devices or containers of mercury devices labeled either "UNIVERSAL WASTE THERMOSTAT(S) " or "WASTE MERCURY THERMOSTAT(S)" or "USED MERCURY THERMOSTAT(S)".(Rule 228 (4)(d): 40 CFR 273.14(d))	273.B	[ ] ___ NI N/A
25. Does handler removing ampules meet the following conditions?		
a. Does facility try to prevent breakage and is doing removal only over a containment device? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(i & ii))	273.B	[ ] ___ NI N/A
b. Does facility have a clean-up system available to transfer spilled material to another container & use it immediately w/ broken or leaking ampules? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(iii & iv))	273.B	[ ] ___ NI N/A
c. Is facility area well ventilated & monitored to ensure compliance w/ OSHA exposure limits? (Rule 228 (4)(d): 40 CFR 273.13(c)(2) (v))	273.B	[ ] ___ NI N/A
d. Does facility have employees familiar w/ proper waste handling & emergency procedures? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(vi))	273.B	[ ] ___ NI N/A
e. Are removed ampules stored in closed, non-leaking container that is in good condition? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(vi))	273.B	[ ] ___ NI N/A
f. Are removed ampules packed in container with packing material to prevent breakage? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(vii))	273.B	[ ] ___ NI N/A
26. When devices do not contain ampules & handler removes original housings that hold mercury, does handler immediately seal original housing to prevent mercury release & follow all ampule management requirements? (Rule 228 (4)(d): 40 CFR 273.13(c)(3))	273.B	[ ] ___ NI N/A
27. If waste is generated from removal of ampules or housings, or if clean-up residues are generated, is it determined if it is hazardous waste? (Rule 228 (4)(d): 40 CFR 273.13(c)(3)(i))(A&B), 273.13(c)(4)(i)	273.B	[ ] ___ NI N/A
a. If waste is characteristic, is it managed in compliance w/ part 260-272 and Part 111? (Rule 228 (4)(d): 40 CFR 273.13(c)(4)(ii))	273.B	[ ] ___ NI N/A
b. If waste is not hazardous waste, is it managed in compliance w/ Parts 115 & 121 of Act 451, as applicable? Rule 228 (4)(d): 40 CFR 273.13(c)(4)(iii))	273.B	[ ] ___ NI N/A

PESTICIDES: Rule 228(4) adopts 40 CFR 273 except 273.10 & 273.18(h)		**QTY HANDLED:**
28. Handler prevents releases by containing pesticides in containers that are closed, structurally sound & compatible w/ pesticide, & does not show evidence of leakage, spillage or damage? (Rule 228(4)(a): 40 CFR 273.13(b)(1))	273.B	[ ] ___ NI N/A
29. If original container is in poor condition, is it over-packed in acceptable container? (Rule 228(4)(a): 40 CFR 273.13(b)(2))	273.B	[ ] ___ NI N/A
30. If stored in tank, are requirements of 40 CFR Part 265, Subpart J met except 265.197(c), 265.200, & 265.201? **[USE TANK CHECKLIST]** (Rule 228(4)(a): 40 CFR 273.13(b)(3))	273.B	[ ] ___ NI N/A
31. If stored in transport vehicle or vessel, is it closed, structurally sound & compatible w/ pesticides & shows no evidence of leakage, spillage or damage?? (Rule 228(4)(a): 40 CFR 273.13(b)(4))	273.B	[ ] ___ NI N/A
32. Are pesticides in a container, tank or transport vehicle labeled either "UNIVERSAL WASTE-PESTICIDE(s)" or "WASTE-PESTICIDE(s)" (Rule 228(4)(a): 40 CFR 273.14(b) **[See 273.14(c) if 273.14(b) not possible]**	273.B	[ ] ___ NI N/A

PHARMACEUTICALS: (Rule 228(4)		**QTY HANDLED:**
33. Are pharmaceuticals managed in a manner to prevent release of any universal waste or components of universal waste by containing pharmaceuticals in structurally sound packaging that is compatible w/ contents & will prevent breakage, & kept closed? Are containers that do not meet these conditions over packed in a container that does? (Rule 228(4)(e)(i))	273.B	[ ] ___ NI N/A
34. Does handler disassemble packaging & sort pharmaceuticals? (Rule 228(4)(e)(iii))	273.B	[ ] ___ NI N/A

35. Are incompatible pharmaceuticals segregated & adequate distance maintained to prevent contact w/ incompatible materials? (Rule 228(4)(e)(iv)	273.B	[ ] ___ NI N/A
36. If a release occurred, was it immediately cleaned up and properly characterized for disposal? (Rule 228(4) (e) (ii))?	273.B	[ ] ___ NI N/A

ACCUMULATION TIME LIMITS (Rule 228(4): 40 CFR 273.15)

37. Is universal waste accumulated one year or less? (Rule 228(4)(a): 40 CFR 273.15(a)) (if no go to question 38)	273.B	[X] ___ NI N/A
38. If accumulated over one year, is accumulation necessary to facilitate proper recovery, treatment or disposal? (burden on handler to demonstrate) (Rule 228(4)(a): 40 CFR 273.15(b))	273.B	[ ] ___ NI N/A
39. Is length of time universal wastes stored documented by one of the following:		
a. container marked or labeled w/ earliest date when universal waste became a waste? (Rule 228(4)(a): 40 CFR 273.15(c)(1))	273.B	[ ] ___ NI N/A
b. individual items of universal waste marked or labeled w/ earliest date it became a waste?? (Rule 228(4)(a): 40 CFR: 273.15(c)(2))	273.B	[ ] ___ NI N/A
c. inventory system maintained on-site that identifies date each item became a universal waste? (Rule 228(4)(a): 40 CFR 273.15(c)(3))	273.B	[X] ___ NI N/A
d. inventory system maintained on-site that identifies earliest date items in a group or group of containers became a universal waste? (Rule 228(4)(a): 40 CFR (273.15(c)(4))	273.B	[ ] ___ NI N/A
e. universal waste placed in a specific accumulation area & the earliest date is identified when waste was first put in area or date received? (Rule 228(4)(a): 40 CFR (273.15(c)(5))	273.B	[ ] ___ NI N/A
f. any other method when demonstrates length of time universal waste accumulated & date it became a waste or received? (Rule 228(4)(a): 40 CFR (273.15(c)(6))	273.B	[X] ___ NI N/A

EMPLOYEE TRAINING (Rule 228(4): 40 CFR 273.16)

40. Are employees familiar w/ universal waste handling/emergency procedures, relative to their responsibilities? (Rule 228(4): 40 CFR 273.16))	273.B	[X] ___ NI N/A

RESPONSE TO RELEASE (Rule 228(4): 40 CFR 273.17)

41. Are releases of universal waste & other residue immediately contained? (Rule 228(4): 40 CFR 273.17(a))	273.B	[ ] ___ NI N/A
42. Is material from release characterized? (Rule 228(4): 40 CFR 273.17(b))	273.B	[ ] ___ NI N/A
43. If released material is hazardous waste is it managed as required under Parts 260 – 271 and Part 111? (Rule 228(4): 40 CFR 273.17(b))	273.B	[ ] ___ NI N/A

OFF-SITE SHIPMENTS (Rule 228(4): 40 CFR 273.18

44. Is waste sent to another handler, destination facility or foreign destination? (Rule 228(4)(a): 273.18(a))	273.B	[X] ___ NI N/A
45. If the SQH self-transports waste, does it comply with the universal waste transporter requirements? (Rule 228(4)(b)	273.B	[ ] ___ NI N/A
46. If waste is a USDOT hazardous material, are USDOT requirements met w/regard to package/labels/ marking/placards/shipping papers? (Rule 228(4)(a): 273.18(c))	273.B	[X] ___ NI N/A
47. Prior to shipping universal waste off-site did receiver agree to receive shipment? (Rule 228(4)(a): 40CFR 273.18(d))	273.B	[X] ___ NI N/A
48. If universal waste shipped off-site is rejected by other handler or destination facility, did originating handler either:		
a. receive the waste back? (Rule 228(4)(a): 40 CFR 273.18(e)(1))	273.B	[ ] ___ NI N/A
b. agree to where shipment will be sent? (Rule 228(4)(a): 40 CFR 273.18(e)(2)	273.B	[ ] ___ NI N/A
49. If handler rejects part or full load from another handler, did receiving handler contact originating handler & discuss either:		
a. sending the waste back to originating handler? : (Rule 228(4)(a): 40 CFR 273.18(f)(1)) **OR**	273.B	[ ] ___ NI N/A
b. agreeing to where shipment will be sent? (Rule 228(4)(a): 40 CFR 273.18(f)(2))	273.B	[ ] ___ NI N/A
50. If handler received shipment of hazardous waste that is not universal waste, was the WHMD District Supervisor or designee immediately notified? (Rule 228(4)(a)):40 CFR 273.18(g))	273.B	[ ] ___ NI N/A
51. If handler received a shipment of non-hazardous, non-universal waste, was the waste managed in accordance w/ applicable waste regulations (e.g. solid, liquid industrial, or medical waste)? (Rule 228(4)(a): 40 CFR 273.18(h))	273.B	[ ] ___ NI N/A

EXPORTS (Rule 228(4): 40 CFR 273.20)

52. If waste is sent to a foreign destination does handler:		
a. comply with primary exporter requirements in 40 CFR 262.53, 262.56(a)(1-4 &6) and(b) and 262.57? (Rule 228(4): 40 CFR 273.20(a))	273.B	[ ] ___ NI N/A
b. export with consent of receiving country and in compliance with Acknowledgment of Consent, Subpart E, 40 CFR 262? (Rule 228(4): 40 CFR 273.20(b))	273.B	[ ] ___ NI N/A
c. provide copy of EPA Acknowledgement of Consent to transporter? (Rule 228(4): 40 CFR 273.20(c))	273.B	[ ] ___ NI N/A

TRANSPORTER (Rule 228(6): 40 CFR 273 subpart D except 273.50, 53)

53. Does transporter dispose of universal waste? (Rule 228(6): 40 CFR 273.51(a))	273.D	___ [ ] NI N/A
54. Does transporter dilute or treat universal waste, except if responding to releases? (Rule 228(6): 40 CFR 273.51(b))	273.D	___ [ ] NI N/A
55. If transporting responds to release, do they immediately contain it and characterize residue? If hazardous waste, does transporter meet requirements in 40 CFR 262? (Rule 228(6): 40 CFR 273.54))	273.D	[ ] ___ NI N/A
56. If universal waste stored at transfer facility over 10 days, does transporter meet applicable handler requirements? (Rule 228(6): 40 CFR 273.54))	273.D	[ ] ___ NI N/A
57. Does transporter comply w/ USDOT requirements for package/labels/marking/placards/shipping papers if universal waste is also hazardous material? ***Shipping papers cannot describe universal waste as "hazardous waste, (l) or (s), n.o.s." nor have waste added to USDOT proper shipping name.*** (Rule 228(6)(a): 40 CFR 273.52 and 273.55(b))	273.D	[ ] ___ NI N/A
58. Does transporter meet export conditions contained in 273.56 (dependent on which country will receive shipment)? (Rule 228(6): 40 CFR 273.56)	273.D	[ ] ___ NI N/A
a. has a copy of EPA Acknowledgement of Consent with shipment? (Rule 228(6): 40 CFR 273.56(a)	273.D	[ ] ___ NI N/A
b. delivers shipment to facility designated by person initiating the shipment? (Rule 228(6): 40 CFR 273.56(b))	273.D	[ ] ___ NI N/A

COMMENTS: